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April 29, 2019

Clerk,
Hon. Daniel J. Stewart
James T. Foley US Courthouse
445 Broadway
4th Floor, Rm 409
Albany NY 12207

Re: J&J Sports Productions v Robert J Taaffe, et al
Our File #2217158
Case # 1:18-cv-0491(TJM/DJS)

Dear Sir/Madam:

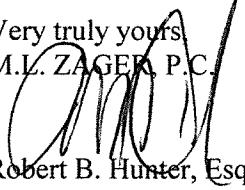
Our firm is counsel to J&J Sports Productions, Inc., Plaintiff with respect to the above referenced matter.

I write to request pre-motion conference with respect to Defendants' failure to comply with discovery demands. Defendants have failed to respond to any discovery demands previously served by Plaintiff.

On July 17, 2018, Plaintiff served its First Request for Production of Documents, Plaintiff's First Request for Admissions and Plaintiff's First Set of Special Interrogatories. To date, Defendants have failed to respond to any of Plaintiff's discovery demands. This despite both Plaintiff's oral communications with Defendants' counsel on 11/20/18 and 2/25/19.

It is respectfully requested therefore that this court schedule a pre-motion conference so that Plaintiff may file a motion with respect to defendant failure to comply with discovery demands.

Respectfully submitted,

Very truly yours,
M.L. ZAGER, P.C.

Robert B. Hunter, Esq.

RH/jm

cc: Clemente J. Parente
Jackson Lewis P.C. - Albany Office
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